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 DISTRICT OF UTAH
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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

CENTRAL DIVISION

MK GOLD COMPANY,

Plaintiff,

v.

WASHINGTON GROUP INTERNATIONAL,
 f/k/a MORRISON KNUDSEN
 CORPORATION a Delaware corporation,

Defendant.

Civil No. 2:96CV00935ST

Civil No. 2:98CV 0327ST

Judge Ted Stewart
 Magistrate Judge Ronald N. Boyce

LEUCADIA NATIONAL CORPORATION, a
 New York corporation,

Plaintiff,

v.

WASHINGTON GROUP INTERNATIONAL
 f/k/a MORRISON KNUDSEN
 CORPORATION, a Delaware corporation,

Defendant.

**DEFENDANT'S MOTION IN LIMINE
 TO EXCLUDE FROM EVIDENCE
 TESTIMONY FROM MR. BROUH
 REGARDING DAMAGES FROM THE
 SAN CRISTOBAL PROJECT**

ASAP

Defendant Washington Group International, Inc. ("Washington") moves the Court for an order excluding from evidence testimony from Mr. Brough regarding Damages from the San Cristobal Project.

It is undisputed that Washington will not obtain any profits from San Cristobal and that MK Gold never submitted a bid on the project and has not lost any profits. Any testimony from Brough regarding damage to MK Gold from San Cristobal is irrelevant and lacks foundation and must be excluded.

DATED this 26th day of March, 2001.

HATCH, JAMES & DODGE

By:



Brent O. Hatch
Mark R. Clements

Attorneys for Defendant Washington Group International, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of March, 2001, I caused a true and correct copy of the foregoing to be hand delivered to the following:

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